

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**JOSE ZEPEDA, Individually and on §  
Behalf of Others Similarly Situated, §**

**Plaintiff, §**

**v. §**

**ALL MY SONS MOVING & STORAGE §  
OF DALLAS, INC., §**

**Defendant. §**

**Civil Action No. 3:24-cv-248-G**

**JURY TRIAL DEMANDED**

**COLLECTIVE ACTION PURSUANT  
TO 29 U.S.C. § 216(b)**

**JOINT MOTION TO EXTEND DEFENDANT’S ANSWER DEADLINE**

Pursuant to the Federal Rules of Civil Procedure and the Local Rules, the parties file this Joint Motion to Extend Defendant’s Answer Deadline. Defendant’s Answer is currently due on February 27, 2024. For the foregoing reasons, the parties seek to extend the Answer deadline by two weeks—to March 12, 2024. Counsel for both parties conferred regarding this motion and agreed that there is good cause for seeking this extension. This is the first request for an extension of this deadline.

Plaintiff filed his Original Complaint on January 31, 2024. (ECF 1). Defendant was served on February 6, 2024. (ECF 5). Pursuant to Rule 12 of the Federal Rules of Civil Procedure, Defendant’s Answer to the Complaint is due 21 days later—on February 27, 2024.

Counsel for both parties communicated by email and phone earlier this month regarding certain key facts that could be outcome determinative in this matter. Plaintiff’s counsel was recently out of town on a previously scheduled vacation, and Plaintiff was out of the country visiting family. As such, counsel has been unable to speak with Plaintiff, but the two have a call scheduled for later this week. The extension requested will allow Plaintiff and his counsel time to

speak regarding these key facts, and allow time for counsel for both parties to discuss that conversation and what it means for this matter going forward.

Accordingly, the parties respectfully request that the Court grant this motion for extension of time and reset the deadline for Defendant's Answer to March 12, 2024.

Respectfully submitted,

**GASPER LAW PLLC**

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**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

On February 26, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Travis Gasper  
Travis Gasper